IN THE DISTRICT COURT FOR THE VIRGIN ISLANDS DIVISION OF ST. CROIX

ERIC MARTIN, Individually and on Behalf of All Others Similarly Situated,	
Plaintiff,	
v.	CIVIL NO. 1:15-CV-00024
ALTISOURCE RESIDENTIAL CORPORATION, WILLIAM C. ERBEY, ASHISH PANDEY, KENNETH D. NAJOUR, ROBIN N. LOWE, and RACHEL M. RIDLEY,	
Defendants.	

MOTION FOR ADMISSION OF PAUL W. HUGHES PRO HAC VICE

Hunter & Cole, by Richard H. Hunter, respectfully moves this Court, pursuant to LRCi 83.1(b)(2) and (c), to admit Paul W. Hughes *pro hac vice* in the captioned proceeding.

In support of this motion, the following is respectfully represented:

- 1. Attorney Hughes is a member in good standing of the New York Bar. *See* Pro Hac Vice Application attached as **Exhibit 1** at § B(2); Certificate of Good Standing, attached as **Exhibit 2**.
- 2. Attorney Hughes is not under suspension or disbarment by any court. *See* Exhibit 1 at § A(2); Declaration of Paul W. Hughes at ¶ 4, attached as **Exhibit 3**.
- 3. The undersigned, a member in good standing of the bar of this Court, has entered an appearance on behalf of defendants Altisource Residential Corporation, Ashish Pandey, Kenneth D. Najour, Robin N. Lowe, and Rachel M. Ridley and all notices, orders and pleadings may be served on the undersigned.

- 4. On information and belief, the undersigned certifies, pursuant to LRCi 83.1(b)(2), that Attorney Hughes has not been admitted *pro hac vice* before this Court.
- 5. On information and belief, Attorney Hughes is fully qualified to appear *pro hac vice* before this Court.
- 6. The \$250.00 fee for Attorney Hughes' *pro hac vice* admission will be paid to the Clerk of this Court contemporaneously with the filing of this motion.

Accordingly, it is respectfully requested that this Court admit Attorney Hughes *pro hac vice*. A proposed order is attached.

Respectfully submitted,

HUNTER & COLE

Dated: March 21, 2016

/s/ Richard H. Hunter Richard H. Hunter (VI Bar No. 332) 1138 King Street, Suite 3 Christiansted, VI 00820 (340) 773 3535

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Attorneys for Defendants, Altisource Residential Corporation Ashish Pandey Kenneth D. Najour Robin N. Lowe Rachel M. Ridley

CERTIFICATE OF SERVICE

I hereby certify that on the 21 day of March, 2016, I electronically filed the foregoing **MOTION FOR ADMISSION OF PAUL W. HUGHES** with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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> /s/ <u>Richard H. Hunter</u> Richard H. Hunter